

IN THE CIRCUIT COURT FOR HOWARD COUNTY

SHAREN KAYLOR \*  
108 Conestoga Rd. \*  
Middle River, Maryland 21220 \*

And \*

GEORGE L. KAYLOR, II and \*  
SHAREN KAYLOR, Husband and Wife \*  
108 Conestoga Rd. \*  
Middle River, Maryland 21220 \*

*Plaintiffs,* \*

v. \*

HOBBY LOBBY STORES, INC. \*  
7707 SW 44<sup>th</sup> \*  
Oklahoma City, OK 73179 \*

SERVE ON: \*  
CSC-Lawyers Incorporating Service Company \*  
7 St. Paul St., Suite 820 \*  
Baltimore, MD 21202 \*

*Defendant.*

\* \* \* \* \*

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiffs, Sharen Kaylor and Sharen Kaylor and George L. Kaylor, II, Husband and Wife, by and through their attorneys, Eric S. Lickstein, Esquire and Rice, Murtha & Psoras, LLC, hereby sues Defendant, Hobby Lobby Stores, Inc., and as grounds states as follows:

1. That the Circuit Court of Howard County has jurisdiction over Defendant consistent with the Maryland and United States Constitution pursuant to MD Code, Courts and Judicial Proceedings §§ 6-101 et seq.

2. That the Circuit Court of Howard County has venue over Defendants pursuant to MD Code, Courts and Judicial Proceedings, §§ 6-201 et seq.

3. At all hereinafter set forth, and all times relevant times, as evidence of proper venue, Defendant, Hobby Lobby Stores, Inc. (hereinafter “Defendant Hobby Lobby”), is a Oklahoma corporation, registered to do business in Maryland, and doing business in Howard County, Maryland at 9301 Snowden Square Drive, Columbia, Maryland 21046.

4. That on or about February 21, 2020, Plaintiff, Sharen Kaylor, (hereinafter “Plaintiff”) was a business invitee of Defendant Hobby Lobby, and was lawfully shopping at the store of Defendant Hobby Lobby located at 301 Snowden Square Drive, Columbia, Maryland 21046.

5. That at all times relevant hereto, Plaintiff Sharen Kaylor and Plaintiff George L. Kaylor, II, were and continued to be married as Husband and Wife.

6. That at all times relevant hereto, an agent, servant and/or employee of Defendant Hobby Lobby was working in an aisle of the store, while within the scope of and in furtherance of their employment with Defendant Hobby Lobby.

7. That during the course of her shopping, Plaintiff attempted to walk down an aisle, when suddenly and without notice, Plaintiff struck an empty box negligently placed by the employee of Defendant in such a manner as to create a hazard to business invitees and for which Plaintiff had no notice thereof. Plaintiff suffered significant and serious injury as a result of the fall she suffered following the aforesaid incident due to the negligent of the employee of Defendant Hobby Lobby.

#### **COUNT I – NEGLIGENCE**

8. Plaintiffs incorporate the contents of Paragraphs 1-8 as if full set forth herein.

9. That Defendant Hobby Lobby, by and through their agents, employees and/or servants, was careless and negligent in that they failed to use reasonable care to make the premises safe due to lack of safety precautions such as warning signs, caution tape or fencing, improper discarding of empty boxes and/or other equipment, failed to block off the aisle while work was being done, failed to provide any warning of same, and was in other respects, careless, reckless and negligent and knew or should have known of the defective hazardous condition, had the opportunity to cure same or created the defective hazardous condition and failed to cure and/or remedy same.

10. That as a result of the injuries caused by the negligence of the Defendant Hobby Lobby, by and through its agents, employees and/or servants, Plaintiff, suffered excruciating mental and physical pain; sustained injuries including but not limited to injuries to her legs, hip, head, body and limbs; was required to obtain medical and hospital care and treatment in the past and will be required to obtain medical and hospital care and attention in the future; was caused and will be caused in the future to pay for medical and hospital care and attention and was otherwise injured and damaged, permanently.

11. All of Plaintiff's injuries, damages, expenses and losses, past, present and prospective, were, are and will be the direct and proximate result of and due solely to the negligence or want of due care on the part of the Defendant Hobby Lobby, by and through its agents, employees and/or servants, without any negligence or want of due care on the part of this Plaintiff Sharen Kaylor contributing thereunto.

**WHEREFORE**, Plaintiff, Sharen Kaylor, brings this suit and claims as damages a sum in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus costs, against Defendant Hobby Lobby Stores, Inc.

**COUNT II – LOSS OF CONSORTIUM**

12. That Plaintiffs adopt by reference the allegations contained in paragraphs 1 thru 11 of this complaint with the same effect as if herein fully set forth.

13. Plaintiff Sharen Kaylor and Plaintiff George L. Kaylor, II, were Husband and Wife at the time of the complained of occurrence and continued to be married as Husband and Wife.

14. That the negligent conduct of Defendant Hobby Lobby, and/or its' agents, servants and/or employees, caused injury to the marital relationship of Plaintiffs, including loss of society, affection, assistance and companionship.

**WHEREFORE**, Plaintiffs, Sharen Kaylor and George L. Kaylor, II, bring this suit and claim damages, costs and interest against Defendant, Hobby Lobby Stores, Inc., in excess of Seventy Five Thousand Dollars (\$75,000.00).

Respectfully Submitted,

/s/ *Eric S. Lickstein*

Eric S. Lickstein, Esquire (#1112140179)

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*Attorneys for Plaintiff*

**CERTIFICATE OF REDACTION**

Pursuant to Md. Rule 20-201 regarding the requirements for electronic filing, I hereby certify and affirm that the foregoing does not contain any restricted information.

/s/ *Eric S. Lickstein*

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ERIC S. LICKSTEIN (1112140179)